

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

HILL HOLLIDAY CONNORS  
COSMOPULOS, INC., d/b/a ERWIN-  
PENLAND,

Plaintiff,

v.

JEFFREY GREENFIELD and  
1st APPROACH, LLC,

Defendants, and Third-Party Plaintiffs,

v.

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS, and JOSEPH A. ERWIN,

Third-Party Defendants.

Civil Action No. 6:08-3980-GRA

**[PROPOSED] CONFERENCE AND  
SCHEDULING ORDER**

Pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of this Court, the following schedule is established for this case. This order is entered to administer the trial of cases in a manner consistent with the ends of justice, in the shortest possible time, and at the least possible cost to litigants.

1. Motions to join other parties or amend the pleadings (Fed. R. Civ. P. 16(b)(1)) shall be filed no later than **December 2, 2009**.
2. Plaintiff shall file and serve a document identifying by full name, address, and telephone number each person whom Plaintiff expects to call as an expert at trial and certifying that a

written report prepared and signed by the expert including all information required by Fed. R. Civ. P. 263(a)(2)(B) has been disclosed to the other parties by **December 1, 2009**.

3. Defendants shall file and serve a document identifying by full name, address, and telephone number each person whom Defendants expect to call as an expert at trial and certifying that a written report prepared and signed by the expert including all information required by Fed. R. Civ. P. 263(a)(2)(B) has been disclosed to the other parties by **December 29, 2009**.

4. Third-Party Defendants shall file and serve a document identifying by full name, address, and telephone number each person whom Third-Party Defendants expect to call as an expert at trial and certifying that a written report prepared and signed by the expert including all information required by Fed. R. Civ. P. 263(a)(2)(B) has been disclosed to the other parties by **January 29, 2010**.

5. Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than **February 16, 2010**. Objections to such affidavits must be made within fourteen (14) days after service of the disclosure. (See Fed. R. Evid. 803(6), 902 (11), or 902(12) and Local Civil Rule 16.02(D)(3)).

6. Discovery shall be completed no later than **March 31, 2010**. Discovery shall be deemed completed within this time only if discovery is initiated at such time as to afford the responding party full time provided under the applicable rule of the Federal Rules of Civil Procedure in which to respond prior to the discovery completion date noted in this paragraph. (The parties may, with the consent of all counsel, conduct discovery up to the time of trial, provided the deadlines in this order are not affected.)

7. All other motions, except (a) those relating to the admissibility of evidence at trial and (b) those to compel discovery, shall be filed no later than **June 1, 2010**. (Fed. R. Civ. P. 16(b)(2)).

8. No later than **June 15, 2010**, the parties shall file and exchange Fed. R. Civ. P. 26(a)(3) pretrial disclosures. Within fourteen (14) days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to the use of a deposition designated by another party and any deposition counter-designations under Fed. R. Civ. P. 32(a)(4). See Local Civil Rule 30.03(J) (video deposition additional requirements).

9. Mediation, pursuant to Local Civil Rule 16.03-16.11, shall be completed in this case on or before **June 30, 2010**. See attached mediation order, which sets forth the mediation requirements. At least thirty (30) days prior to this mediation deadline, counsel for each party shall file and serve a statement certifying that counsel has: (1) provided the party with a copy of the Mediation Order; (2) discussed the availability of mediation with the party, and; (3) discussed the advisability and timing of mediation with opposing counsel.

10. Parties shall furnish the Court pretrial briefs five (5) business days prior to the date set for jury selection (Local Civil Rule 26.05). Attorneys shall meet at least five (5) business days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. See Local Civil Rule 26.07.

11. This case is subject to being called for jury selection and trial on or after **August 12, 2010**.

IT IS SO ORDERED.

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G. ROSS ANDERSON, JR.  
UNITED STATES DISTRICT JUDGE

Anderson, South Carolina

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